

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

216 EAST 29<sup>TH</sup> STREET TRUST ,

Plaintiff,

v.

CITY OF NEW YORK,

Defendant.

Case No. 1:24-cv-595 (ER)

**NOTICE OF MOTION**

Proposed Intervenor, Safe Horizon, Inc., by and through its undersigned counsel, hereby moves, pursuant to Federal Rule of Civil Procedure 24(b), for an Order a) granting it leave to intervene in the above-captioned action and to file the accompanying motion to dismiss and b) granting any other relief that the Court deems just and proper.

The grounds for this motion are set forth in the accompanying declaration of Sebastien Vante, memorandum of law, and Exhibit A (proposed motion to dismiss).

Dated: April 15, 2024  
New York, NY

Respectfully submitted,

By: /s/ Evan Henley  
Evan Henley  
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**CERTIFICATE OF SERVICE**

I, Evan Henley, hereby certify that on April 15, 2024, I caused this Notice of Motion and attached Memorandum of Law, Declaration of Sebastian Vante, and Exhibit A to be filed on the Court's Electronic Case Filing system, which will provide electronic notice to all counsel of record.

/s/ Evan Henley  
Evan Henley